

United States Courts
Southern District of Texas
FILED

September 23, 2020

David J. Bradley, Clerk of Court

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MARANDA LYNN O'DONNELL, et al.

Plaintiffs,

v.

HARRIS COUNTY, TEXAS, et al.

Defendants.

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)
) Case No: 16-cv-01414
) (Consolidated Class Action)
) The Honorable Lee H. Rosenthal
) U.S. District Judge
)
)
)
)

**CONFIDENTIALITY AGREEMENT FOR EXPERT,
CONSULTANT OR EMPLOYEES OF ANY PARTY**

I, Devin Paul Cole, under penalty of perjury, 28 U.S.C. § 1746, state that:

1. Information, including documents and things, designated as "CONFIDENTIAL" or "Confidential Material," as defined in the Agreed Protective Order entered in the above-captioned action ("Agreed Protective Order"), is being provided to me pursuant to the terms and restrictions of the Agreed Protective Order.

2. I have been given a copy of and have read the Agreed Protective Order.

3. I am familiar with the terms of the Agreed Protective Order and I agree to comply with and to be bound by its terms.

4. I submit to the jurisdiction of the United States District Court for the Southern District of Texas for enforcement of the Protective Order.

5. I agree not to use any "Confidential Material" disclosed to me pursuant to the Agreed Protective Order except for purposes of the above-captioned litigation and not to disclose any of this information to persons other than those specifically authorized by the Agreed Protective Order, without the express written consent of the party who designated the information as confidential or by order of the presiding judge.

6. I also agree to notify any stenographic, clerical or technical personnel who are required to assist me of the terms of this Agreed Protective Order and of its binding effect on them and me.

7. I understand that I am to retain all documents or materials designated as or containing "Confidential Material" in a secure manner, and that all such documents and materials are to remain in my personal custody until the completion of my assigned duties in this matter, whereupon all such documents and materials, including all copies thereof, and any writings prepared by me containing any "Confidential Material" are to be returned to counsel who provided me with such documents and materials.

Signed at 12:45 AM, this 17th day of September, 2020.

@ Harris County Jail

Devin Paul Cole
Signature

" I am requesting the Clerk's Entire Record Copied and Sent to me in Russell v. Harris County and Odomell vs. Harris County under the 14th Amendment's Fundamental Fairness Clause."

Devin Paul Cole